Interim Final ROD (IROD) - Perspective

The goal of the IROD is to roll up into one package all accelerated actions necessary to support meeting the intermediate site condition. The intermediate site condition is defined in the RFCA preamble as the period of time during which all weapons useable fissile material and transuranic wastes will be removed from RFETS. By the end of this period, none of these materials, nor the buildings that contained them, will remain. Also by the end of this period, all low-level, low-level mixed, hazardous, and solid wastes will have been shipped off-site, disposed, or stored in a retrievable and monitored manner to protect human health and the environment. Any remaining cleanup will be completed. (RFCA Preamble 9.g.)

The final site condition, or long-term site condition, is not clearly defined in the RFCA preamble. As stated in the RFCA preamble, the long-term site condition follows the intermediate site condition and continues through the indefinite future. Additional cleanup and removal activities may be conducted in this time period as funding, technology and political opportunities allow. The Parties will avoid taking actions that would, as a practical matter, preclude further cleanup in the long-term future. Activities beyond the intermediate site condition are unknown, and perhaps unknowable, and are therefore not described. (RFCA Preamble 9.i.) However, after the intermediate site condition is achieved there will be long-term monitoring, operation and maintenance, and stewardship activities continuing into the indefinite future.

The IROD will be a hybrid of an interim action ROD and a contingency ROD that will identify the interim actions that will support, and be consistent with, the final remedy for RFETS. The IROD is not a final ROD since it will be developed and implemented, once approved, prior to the completion of the Remedial Investigation/Feasibility Study (RI/FS). Although preparation of an RI/FS Report is not required for an interim action, there must be documentation that supports the rationale for the action to fulfill the NCP's Administrative Record requirements. The ROD serves this purpose. A summaries of site data collected during field investigations and potential threats to human and ecological health should be sufficient to document a problem in need of response. In addition, a short analysis of remedial alternatives considered, those rejected, and the basis for the evaluation (as done in a focused FS) should be summarized to support the selected action. (OSWER 9200.1-23P, section 8.2.1)

A contingency ROD may be appropriate when there is significant uncertainty about the ability of the remedial options to achieve cleanup levels. The ROD should specify under what circumstances the contingency remedy would be implemented. The criteria and process by which the contingency will be invoked should be discussed. (OSWER 9200.1-23P, section 8.3) For RFETS, a contingency remedy will be described when there is insufficient information to select one remedy over another in the IROD. As new information is obtained, the information will be compared to the criteria for invoking/selecting a contingency remedy and a remedy will be selected. Each contingency remedy will be evaluated in the IROD, to the extent possible, against the nine criteria for selection of an alternative.

Interim actions are implemented for separate OUs or may be a component of a final ROD for other portions of the site. In either case, an interim action must be followed by a final ROD, which must satisfy all of the following:

1. *Provide long-term protection of human health and the environment;*
2. *Comply with ARARs;*
3. *Fully address the principal threats posed by the site or OU; and*
4. *Address the statutory preference for treatment that reduces the toxicity, mobility, or volume of wastes.*

(OSWER 9200.1-23P, section 8.2)

Note: Corrective Action Decision requirements will be incorporated into the document, so the IROD will be an interim final CAD/ROD that will support, and be consistent with, the final remedy for RFETS. For simplicity, the term IROD is used. The CERCLA/NCP requirements and EPA guidance (OSWER 9200.1-23P) provide the foundation for this draft expanded table of contents/outline.

Interim Final ROD (IROD) – Expanded Table of Contents/Outline

Part 1: Declaration

A. Site name and location
B. Statement of Basis and Purpose
C. Assessment of Site
D. Description of Selected Remedy: The selected interim and contingency remedies should be described in bullet form.
E. Statutory Determinations: The Declaration should be modified to indicate that the selected interim and contingency remedies will satisfy the statutory requirements.
F. ROD Data Certification Checklist
G. Authorizing Signatures

Part 2: Decision Summary

A. Site Name, Location, and Brief Description

B. Site History and Enforcement Activities

C. Community Participation

D. Scope and Role of Operable Units and Response Actions

1. Describe the overall site cleanup plan and highlight the specific activities addressed by the IROD. This will include the scope of the problems those actions will address and the authorities under which each action will be/has been implemented (e.g., removal, remedial, RCRA) and may include the planned sequence of actions.

2. Describe the relationship between CERCLA and other remediation activities at RFETS (e.g., RCRA corrective action, long-term waste management, if necessary).

3. Describe how past response and accelerated actions fit into the overall site cleanup strategy.
   i. Describe each of the past ER and D&D actions and geographic areas proposed for NFA. *(Past ER actions described here will be those that have no long-term Operations &Maintenance (O&M) requirements, e.g., Trench T-3. Each of the past D&D actions will be described here. Geographic areas have been proposed for NFA in accordance with RFCA Attachment 6 and RFCA Appendix 3. The recommendations have been documented in the Historical Release Report (HRR) and/or the annual report to the HRR. The HRR and its associated annual reports are approved by the regulatory agencies; however, geographic areas proposed for NFA are not finally dispositioned until they are included in a ROD. Geographic areas previously proposed as NFA and described here will be considered finally dispositioned and no further action will be taken once the IROD is approved. In some cases, final disposition may not be possible until completion of the comprehensive risk assessment (CRA) where either the CRA results support final disposition or further action, e.g., Ryan's Pit.)*
   ii. Describe past ER actions that require long-term O&M. The decision documents for those actions will be closed and each actions monitoring, O&M requirement(s), and exit strategy for determining when the RAOs have been achieved will become part of the IROD (e.g., Solar Ponds Plume Project IM/IRA; East Trenches PAM; Mound Site IM/IRA; and OU7 Passive Seep Collection and Treatment PAM).
   iii. Describe the relationship of existing decision documents, i.e., RSOPs, B886 IM/IRA; DOPs for 771/774, 776/777, 371, 707; 903 Pad IM/IRA; CAMU IM/IRA Decision Document and Application Support Document for Containerized Storage; and the CAMU IM/IRA Decision Document and Application Support Document for Bulk Storage. (*Note: DOPs for 371 and 707 are under development and a decision has not been made as to which agency will complete the 903 Pad. I recommend that each of these existing*

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decision documents continue independently of the IROD, except the RSOPs. The RSOPs requirements would become folded into the IROD and each RSOP is then closed with the approval of the IROD. In other words, any decision document that has its requirements incorporated into the IROD will be superceded by the IROD, once approved, unless otherwise excluded. The superceded decision document would be closed and no longer be used.)

4. Describe how planned accelerated actions fit into the overall site cleanup strategy. *Define the scope of the problems left to evaluate and potentially remediate under the IROD, e.g., IA groups, COCs, by specific projects if known (landfills, solar ponds) or media, etc., and how the planned accelerated actions support and are consistent with the final remedy and overall site cleanup strategy. Provide detailed descriptions here or brief descriptions here with detailed descriptions in the Description of Alternatives section below.*

5. State how the actions described in the IROD will be consistent with the final action selected for RFETS.

E. Site Characteristics: This section will describe a brief, yet as comprehensive as possible with information known, overview of the site. Maps that highlight the location of sources and distribution of detected contaminants and COCs will be used to the extent possible. This section will focus on the description of those sites (within OUs 1, 3, 5, 6, 7, BZ, and IA [i.e., all OUs] and for both ER and D&D actions) to be addressed by the interim and contingency remedies. A summary of site data collected to date could be described here. To the extent possible, the following topics should be addressed:

1. Describe the Site Conceptual Model *(Note: the SCM may be modified as additional information becomes available).*
2. Provide an overview of the site, including the size of the site (e.g., acres), geographical and topographical information (e.g., surface waters, wetlands).
3. Describe surface and subsurface features.
4. Describe areas of archaeological or historical importance.
5. Describe the sampling strategy. *(This will include a short summary of techniques and methods presented in detail in the IASAP and note that a similar strategy will be implemented in the BZ.)*
6. Describe known or suspected sources of contamination.
7. Describe types of contamination and the affected media, including types and characteristics of COCs, quantity/volume of waste, concentrations of COCs in each medium, RCRA hazardous wastes and affected media.
8. Describe location of contamination and known or potential routes of migration, including lateral and vertical extent of contamination; current and potential future surface and subsurface routes of human or environmental exposure; likelihood for migration of COCs; and human and ecological populations that could be affected.
9. Where groundwater contamination exists that may impact surface water describe the location and extent of the site contamination, types of geologic materials, approximate depths, whether the groundwater is confined or unconfined; ground water flow directions and discharge locations; interconnection between surface and subsurface contamination (e.g., soils, surface water/sediments) and ground water contamination; confirmed or suspected presence and location of NAPLs; groundwater models and major model assumptions used to define the fate and transport of COCs.

The more specific findings of the CRA will be included in the final CAD/ROD for the site.

F. Current and Potential Future Site and Resource Uses
   1. Explain the current and reasonably anticipated future land use.
      i. Current on-site land uses.
      ii. Current adjacent/surrounding land uses.

iii. Reasonably anticipated future land uses, with expected timeframes for such uses and basis for future use assumptions.

2. Explain the current ground/surface water uses and document the basis for future ground/surface water use assumptions.
   i. Current ground/surface water uses on the site and in its vicinity.
   ii. Potential beneficial ground/surface water uses (e.g., surface water protection, ecological protection, potential drinking water, agricultural, recreational, aquatic life) and the basis for future use assumptions.
   iii. No beneficial use as a potential drinking water source is anticipated for groundwater or surface water.
3. Land Use

If a future (permanent) land use decision is made for RFETS congressionally, then the congressional act should be referenced and summarized here. Cleanup under the IROD should be completed to support that land use decision. Ideally, any land use restrictions, transfers, and/or institutional controls would have been implemented as identified in the congressional act.

If a final land use decision has not been made outside of the CERCLA process, the IROD will be based on RFCA, in which cleanup decisions and activities are based on open space and limited industrial uses. The Buffer Zone will be managed, and with cleanup as necessary to accommodate open space uses; the Industrial Area will be remediated as necessary to accommodate open space or industrial uses. It is imperative that a land use decision be made as this is a necessary part of the IROD so that IROD actions will be consistent with the final CAD/ROD. A final land use decision will strengthen the overall site cleanup strategy, RAO, ARARs, and remedy (alternatives and selection) discussions. It may be necessary to discuss this in the context of institutional controls in the description of alternatives section, including comparison analysis of alternatives, and the selection of a remedy sections below.

4. Institutional Controls

If Institutional Controls are selected as part of the remedy, then they would be described here as part of the future site and resource uses; however, identification and definition of IC's, including their purpose and method of implementation, will be analyzed and described in detail in the description of alternatives, including comparative analysis of alternatives and the selection of a remedy sections below.

G. Summary of Site Risks: In the final CAD/ROD for the Site (one final CAD/ROD addressing OUs 1, 3, 5, 6, 7, BZ and IA), this section will state (1) the basis for taking action at the site; (2) a brief summary of the relevant portions of the comprehensive human health risk assessment for the site; and (3) a brief summary of the ecological risk assessment. The CRA will not have been completed; this section of the IROD will focus on risks addressed by the accelerated actions and will describe how the actions will support, and be consistent with, the final remedy for the Site. Results of an action level screen will be presented; qualitative risk information will be presented where quantitative information is not yet available.

(This section will include a table of RFETS COCs and associated action levels and a detailed description of the application of the action levels to trigger interim actions (expand IGD section 3.7 and include the language here and include decision criteria from IASAP DQOs.) under the IROD. Include: a description of determining an action level for a COC that may be discovered, but is not on the table; a brief summary of how the action levels were developed and why individually the action levels are believed to be protective of human health and the environment; a description of the role of the IMP; the application of soil action levels; a description and explanation of factors to consider to ensure that the action will address cumulative risk and dose when multiple COCs are present; and how to incorporate ecological concerns, land and water use into Site cleanup decisions (This section will be a summary of criteria and descriptions included in the IASAP). Note: This section is tied closely to the selection of a contingency remedy section. Where the comparison of data to the action levels table indicates that action is warranted, and the interim remedy can be selected in the IROD, the criteria described above would be addressed via the 9 criteria analysis. Where there is insufficient data, and consequently a remedy cannot be selected in the IROD, contingent remedies will be described, and the

criteria described above can be used to decide which contingent remedy to select once more information/data becomes available. (Note: each contingent remedy will be evaluated against the nine criteria to the extent possible.) Action levels would only be changed if there was significant information indicating that the action level is not protective of human health or the environment.)

H. Remedial Action Objectives: A clear and precise statement of the RAOs will be provided. Other remedy performance expectations and criteria should be included. For each RAO, provide the basis and rationale for the RAO (e.g., current and reasonably anticipated future land use and potential water use) and explain how the RAOs will be consistent with the final action selected for RFETS.

1. Surface Soil: Prevent human exposure to contaminated surface soils above acceptable risk levels (ARARs) appropriate for the designated land use; protect surface water quality via runoff and/or protect ecological resources.
2. Subsurface Soil: Prevent human exposure to contaminated subsurface soils above acceptable risk levels (ARARs) appropriate for the designated land use; remediate subsurface soils to the extent necessary to protect surface water standards via ground water transport and/or ecological resources.
3. Groundwater: Prevent exposure to contaminated ground water above acceptable risk levels (ARARs) and prevent or minimize further migration of contaminants from source materials to groundwater (source control) and to protect surface water standards via ground water transport and/or ecological resources. These objectives will be achieved by _____ (specify timeframe). (*Exposure to groundwater is possible through two pathways: daylight in on-site seeps or daylight to surface water. All contaminated ground water daylights to surface water before leaving RFETS.)*
4. Surface water: At the completion of cleanup activities, all surface water on-site and all surface water and groundwater leaving RFETS will be of acceptable quality for all uses.

I. Description of Alternatives: Interim and contingency remedies must be fully described. For each interim and contingency remedy provide the following major components, as appropriate: treatment technologies and materials the technology will address; containment components of remedy (e.g., engineering controls, cap, passive barriers) and materials they will address (e.g., low concentration source materials, treatment residuals); institutional controls (and the entity responsible for implementing and maintaining them *(may have to wait until final CAD/ROD)*; O&M activities required to maintain the integrity of the remedy; and monitoring requirements.

For each interim and contingency remedy describe, as appropriate: ARARs; long term reliability of remedy; quantity of untreated waste and treatment residuals to be disposed off-site or managed on-site in a containment system and degree of hazard (e.g., concentration) remaining in such material; estimated time for design and construction (i.e., implementation timeframe); estimated time to reach remediation goals (i.e., time of operation, period of performance); estimated capital, annual O&M, and total present worth costs; discount rate and the number of years over which the remedy cost estimate is projected.

Describe the expected outcome after actions are completed: available uses of land upon achieving cleanup levels and available uses of water upon achieving cleanup levels.

a. Environmental Remediation
   i. NFA

   As used in the following discussion, a geographic area could be an IHSS, PAC, UBC, Source Area, OU, or AOC. This discussion is adapted from the 1999 IGD. IGD figure 3-5, modified to be consistent with the following discussion, could be included in this section of the IROD. NFA recommendations (proposed after the IROD is approved) would be submitted to the regulators in a close-out report (which would become a chapter in the Interim Remedial Action Completion Report) or continue documentation in the HRR Annual Report. Both the Interim Remedial Action Completion Report and the HRR, and annual updates, will support the final CAD/ROD.

1. Conduct source evaluation. If a review of historical release information/defensible data reveals that no current or potential contaminant source exists, then the exposure pathway is incomplete and the geographic area may be recommended for NFA.
2. Conduct data evaluation. If the available data are not of sufficient quality or quantity to evaluate a geographic area by means of ARARs, then additional environmental data must be collected.
3. Conduct an ARARs comparison. If media-specific environmental data collected from the geographic area are below ARARs for surface water, ground water, or soils, the geographic area may be proposed for NFA.
4. Determine required actions. If ARARs for any medium are exceeded, remedial management action or an evaluation is required. If an evaluation demonstrates that no action is required to protect surface water and ecological resources, the area may be proposed for NFA.

ii. Action

1. Soil

Soil at many IHSSs, PACs, and UBCs at RFETS are known to be contaminated with radiocnuclides and VOCs, and to a lesser extent, with metals, SVOCs, and pesticide/PCBs. The following remedial alternatives are based on the presumptive remedy for VOCs in soil and off-site disposal of residual radionuclides/metals/SVOCs above ARARs.

A. Cap or stabilize in place, institutional controls, monitoring (See 5 below.)
B. Excavation, on-site thermal desorption, and on-site disposal of residuals
C. Excavation, on-site thermal desorption and off-site disposal of residuals
D. Excavation, off-site thermal desorption and off-site disposal of residuals
E. Excavation, off-site disposal of residuals

2. Ground Water

There are several groundwater plumes at RFETS that are currently being remediated or plans for remediation are in preparation. VOCs, and to a lesser extent uranium, are the principal contaminant. The following remedial alternatives are being either implemented or considered for future remediation.

A. Ground Water Extraction and Treatment Components
B. Ground Water or Source Containment (e.g., NAPL) Components
C. Ground Water Components that Incorporate Monitored Natural Attenuation (See iv below.)
D. Passive Barriers
E. In-situ Treatment

The following information will be included in the Selected Remedy section where selection of a specific presumptive technology for treatment of extracted ground water was deferred until the Remedial Design Phase. If enough information is known at the time of the IROD, some or none of this section may be necessary. This discussion may be needed e.g., OU7, if the cap, as the final remedy, does not sufficiently address seep water; IA plume, if an action is required; or surface water/ponds, if some type of water treatment is needed.

Examples of presumptive remedies for dissolved organic contaminants are: air stripping, granular activated carbon, chemical/UV oxidation, and aerobic biological reactors. Examples of presumptive remedies for metals are: chemical precipitation, ion exchange/adsorption, electrochemical methods, aeration of background metals.

A. Statement that one or more of the presumptive treatment technologies will be used.

B. Statement that the actual technologies and sequence in which they will be employed is being deferred until the remedial design state, when additional information will be available.
C. Description of what the treatment system will be designed to accomplish (e.g., meet ARARs for discharge to surface water).
D. Reference the presumptive remedy guidance for a description of presumptive technologies and their advantages and limitations.
E. Assumed treatment sequence and statement that this will be used only as a basis for estimating remedy costs.

3. Surface Water/Drainages/Ponds (including potential for new reservoir on-site)
(The IROD will have to specifically describe the regulatory authority of the existence and cleanup of the ponds, based on their history, including the NPDES permit and waters of the US discussions.)

A. Address the final ground surface configuration of RFETS following completion of all remedial actions. The objective is to develop a final configuration that maximizes protection of human health and surface water consistent with the designated land use. A final configuration design will incorporate all appropriate physical, chemical and biological information including the site water balance and actinide migration evaluations. Configuration will address the Industrial Area, the inner Buffer Zone, and the Woman and Walnut Creek drainages.
B. Describe the final configuration of the drainages. This discussion addresses issues related to reconciling the requirements for complying with surface water protection standards both on-site and at the Site boundary with requirements related to protection of wetlands and threatened species. Factors include water balance at closure, retention time requirements in the ponds to ensure settling of contaminants, and post-closure stewardship requirements and costs.

4. Temporary Water Treatment Units *(including treatment, if necessary, of incidental waters)*
A. B891
B. Replacement for B374

5. Stabilize and Cover
A. Landfills
aa. Present Landfill (OU7): Describe the history and current status of the landfill and the issue related to the preferred closure option. This includes discussion of the landfill's RCRA interim status, remedial actions already taken (leachate treatment), and current standby mode. The closure discussion addresses the repair of the slurry wall and installation of a cap as a presumptive remedy. The issue of the cap is that the EPA presumptive remedy invokes Subtitles C and D substantive requirements as ARARs to guide cap design. Subtitles C and D designs are based on impermeability criteria and have a reputation throughout the country for failure. The preferred option for the Present Landfill is an evapo-transpiration (ET) cover whose design is based on water absorption and evaporation from a soil layer as well as transpiration via vegetation rather than impermeability. EPA does not yet approve these covers as presumptive remedy designs. The discussion will focus on the adequacy of the performance-based requirements of RFCA Attachment 10 to suffice as presumptive design criteria.

bb. Original Landfill (OU5): Describe the history and current status of the landfill and the issues related to closure. This includes discussions of the landfill being closed before RCRA interim status requirements were

promulgated, and potential issues related to the location of the site as well as potential contents of the landfill cell. Discussion will also include construction considerations (hillside buttressing) and the preference of an ET cover.

cc. Solar Evaporation Ponds (SEP): Describe the history and current status of the SEP (RCRA unit, dry sediments removed, liners in place) and the options for closure. Discussion will address the RFCA requirements to close the cap (ET cap preferred) following D&D of several small structures and remediation of several nearby contaminant release sites.

dd. Some other area than may need cap (not 700-Area)?

ee. Recontour of Site (including use of recycled concrete and/or soils) *This may be captured as part of the final land configuration discussion above.*

6. Monitored Natural Attenuation
   A. Explanation of why natural processes are expected to achieve remedial objectives in a time frame that is reasonable in comparison to other alternatives.
   B. If a relatively long time frame is required for natural processes to attain remediation goals, explain why this remediation time period is appropriate for conditions at the site (e.g., no anticipated need for site ground water during this period and no impact to surface water).
   C. A description of the performance monitoring that will be part of the remedy and will be used to determine if natural attenuation is proceeding as anticipated.
   D. If applicable, a description of the contingency measures that will be implemented should the monitoring show that natural attenuation is unable to achieve the cleanup goals. Conditions that trigger the contingency should be specified (e.g., continued plume migration or contamination levels are well above levels predicted for a specified time or impact to surface water).
   E. Describe the institutional controls that will be implemented to prevent use of contaminated ground water until cleanup levels are achieved.
   F. Identify which IHSS/ground water plumes this would apply to (e.g., IHSS 118.1).

b. Decontamination & Decommissioning, Including Demolition

Describe the requirements of the RSOPs (Facility Disposition and Building Component Removal and Decontamination) here. This may need to be further evaluated – there may be additional "analysis of alternatives" requirements for the alternatives currently in the RSOPs in order to meet the requirements of the IROD than was required for the RSOPs themselves.

J. Comparative Analysis of Alternatives: The selected interim and contingency remedies, and other alternatives considered should be evaluated fully against the nine criteria; the uncertainties should be noted, as well as the expectations for performance. Community (and support agency) acceptance of an innovative technology should be discussed. *(This sections should demonstrate how each contingency meets the nine criteria: 1) protection of human health and the environment; 2) compliance with ARARs; 3) Long-term effectiveness and permanence; 4) toxicity, mobility, or volume reduction through treatment; 5) short-term effectiveness; 6) implementability; 7) cost; 8) state agency acceptance; 9) community acceptance.)*

NEPA: In accordance with RFCA Paragraph 95, the NEPA/CERCLA integration approach in DOE Order 451.1A, *National Environmental Policy Act Compliance Program*, June 1997, and DOE's *Secretarial Policy on the National Environmental Policy Act*, June 1994, the IROD will incorporate NEPA values to effect NEPA compliance for RFETS site closure activities. NEPA values will be incorporated through the public comment and response process for the IROD and preparation of an Environmental Consequences analysis which will analyze environmental impacts of overall site

closure activities. Impacts of each site-wide closure alternative will be assessed, as required. The analysis will address the following resource areas: socioeconomics, soils and geology, air quality, water resources and quality, human health and safety, ecological resources, historic and archeological resources, visual resources, noise and transportation. As set forth in NEPA regulations, cumulative impacts, unavoidable adverse effects, short-term uses versus long-term productivity, irreversible and irretrievable commitments of resources, and mitigative measures will also be discussed. The Environmental Consequences analysis will be provided as a technical memorandum or included in the IROD itself.

K. Principal Threat Waste
In evaluating the statutory preference for treatment as a principal element, the site manager needs to decide whether treatment selected in the ROD constitutes treatment as a major component of the remedy for that site. Remedies which involve treatment of principal threat wastes likely will satisfy the statutory preference for treatment as a principal element, although this will not necessarily be true in all cases (e.g., when principal threat wastes that are treated represent only a small fraction of the wastes managed through containment).

L. Selected Remedies: The selected interim or contingency remedies should be identified. The criteria that will be used to decide to implement the contingency remedies and the vehicle for invoking the contingency should be identified.

M. Statutory Determinations: The statutory determination discussion should document that all remedies fulfill CERCLA section 121.

N. Five-Year Reviews: 40 CFR 300.430(f)(4)(ii) requires a five-year review if the remedial action results in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure. This review evaluates whether a remedy currently is, or will be, protective of human health and the environment. The final ROD must state whether a five-year review is required pursuant to CERCLA section 121 and 40 CFR 300.430(f)(5)(iii)(C). Interim Actions have been ongoing at RFETS since 1990.

Each interim action taken prior to the approval of this IROD has been reviewed as part of the development of this IROD to determine if the remedy is, or will be protective of human health and the environment. If it has been determined by this review that further action is warranted, then the area has been included as part of this IROD as requiring further action consistent with this IROD. If it was determined that no further action was required, then the area has been documented in the NFA section described above and approval of this IROD is documentation that no further action is required. Other previous accelerated actions that do not fall into one of these two categories will continue to be monitored and will be further evaluated in support of the final CAD/ROD for the site.

Statutory five-year reviews that were mandated by the OU1 and OU3 CAD/RODs have been incorporated into this IROD. The approval date of this IROD is the trigger date for all future five-year reviews until the final CAD/ROD is approved for the site.

O. Documentation of Significant Changes

Part 3: Responsiveness Summary

A. Stakeholder Comments and Lead Agency Responses
B. Technical and Legal Issues